



## ***Requirements Document***

**PRC-RD-SH-7652**

# **Safety and Health Inspections**

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**Project: CH2M HILL Plateau Remediation Company**

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### 1.0 PURPOSE AND SCOPE

This Level 1 Requirements Document is applicable to CH2M HILL Plateau Remediation Company (CHPRC) Team employees. It establishes the minimum requirements for:

- Conducting and documenting general hazard inspections for the workplace to identify existing and potential safety and health hazards and non-compliances with Department of Energy (DOE)-prescribed Occupational Safety and Health (OSHA) standards, and
- Assessing safety and health impacts associated with proposed facility changes to ensure the potential for any new hazards being introduced into the workplace as a result of change are adequately identified and addressed, and
- Conducting and documenting general observations of safe behaviors in the workplace, and providing on-the-spot coaching when an unsafe act/behavior is observed.

**NOTE 1:** *These inspections are not intended to include the performance of formal readiness reviews used in preparation for startup or restart of facilities (refer to PRC-PRO-OP-055, Startup Readiness), management assessments (refer to PRC-PRO-QA-246, Management Assessment), Fire Protection assessments (refer to HNF-RD-9391, Fire Protection Assessments and HNF-RD-9717, Fire Prevention for Construction/Occupancy/Demolition Activities), or building administrator property inspection (refer to PRC-PRO-PMT-475, Real Property Asset Management).*

**NOTE 2:** *Projects/Organizations participating in DOE-Voluntary Protection Program should consult DOE Document No. DOE/EH-0433, Part I, Program Elements for Worksite Analysis requirements defined by the Department of Energy Voluntary Protection Program (DOE-VPP).*

This document implements the PRC-MP-MS-003, *Integrated Safety Management System/Environmental Management System Description*, Core Function of identifying hazards and requirements, analyzing hazards and implementing controls, and providing feedback and continuous improvement.

### 2.0 IMPLEMENTATION

This document is effective upon publication.

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## 3.0 REQUIREMENTS

## 3.1 General

**NOTE:** For the tables in this section under the requirement "type" column, "V" means verbatim and "I" means interpreted.

#	Requirement	Type V or I	Source
1.	<p>Formal safety and health inspections shall be scheduled and conducted by responsible supervisors, to include work areas and activities under their jurisdiction, to identify and correct existing and potential workplace hazards and unsafe acts/behaviors.</p> <p><b>NOTE:</b> Employee participation is encouraged, and should be solicited.</p>	I	10 CFR 851.22(a)
2.	<p>Personnel who possess the requisite skill and knowledge to perform formal safety and health inspections, have an understanding of the safety and health regulatory requirements relating to the scope of the inspection, and have authorization to have the hazards corrected shall participate in the inspection.</p>	I	10 CFR 851.25(a)
3.	<p>The minimum frequency for performance of formal safety and health inspections shall be as follows:</p> <ul style="list-style-type: none"> <li>Office Areas - Quarterly</li> <li>Field Operations, Maintenance, D&amp;D (Including Shops &amp; Storage Areas) - Monthly</li> <li>Demolition or Deconstruction - Weekly</li> </ul> <p><b>NOTE 1:</b> The project/organization, in consultation with the Occupational Safety and Industrial Hygiene (OS&amp;IH) Manager may increase the frequency of such inspections based on levels of risk and complexity of work scope and conditions, or decrease the frequency during periods of initial mobilization, inactivity, or site shutdown.</p> <p><b>NOTE 2:</b> The OS&amp;IH web site provides sample criteria for Office Area safety and health inspections.</p> <p><b>NOTE 3:</b> As part of the safety and health inspections, the User should consider performing a Human Performance Observation (HPO). An example of a HPO check list is located in PRC-GD-SH-28975, Best Management Practices in Occupational Safety and Health.</p>	I	10 CFR 851.22(a)

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#	Requirement	Type V or I	Source
4.	<p>Formal safety and health inspections shall be documented to identify workplace hazards, and submitted to the project/organization safety office or representative.</p> <p><b>NOTE 1:</b> <i>Inspection Checklists are provided as non-mandatory examples. Projects should modify their content to create site-specific versions applicable to their work scope. In doing so, avoid duplication or redundancy with respect to items currently being inspected under the Building Administrator program (PRC-PRO-PMT-475).</i></p> <p><b>NOTE 2:</b> <i>Appendix A provides guidance on use of inspection checklists.</i></p>	I	10 CFR 851.21(a)
5.	Completed formal safety and health inspections should be reviewed by the project/organization safety office or representative to obtain knowledge of the results and to work with management to help ensure recommendations are applied.	I	10 CFR 851.22(a)
6.	<p>Safety and health inspection performance shall be communicated to the project/organization management team.</p> <p><b>NOTE:</b> <i>This reporting function should reside with the project/organization safety office or representative, with input from the OS&amp;IH Central Support organization, when requested.</i></p>	I	10 CFR 851.22(a)
7.	Formal safety and health inspection results (e.g., checklists) shall be reviewed to identify trends or program areas of potential concern.	I	10 CFR 851.21(a)
8.	<p>Projects/Facilities/Functional organizations safety office or representative shall identify and process safety and health issues identified by Projects resulting from inspection as required per PRC-PRO-QA-052, <i>Issues Management</i>.</p> <p><b>NOTE:</b> <i>In addressing and tracking resolution of safety issues, a Condition Report (CR) should be initiated for conditions that may require analysis, trending, cause determination, or identification and tracking of corrective actions. Refer to PRC-PRO-QA-052.</i></p>	I	PRC-MP-QA-599, Section 3.0, Paragraph 2.2.1

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#	Requirement	Type V or I	Source
9.	<p>Informal safety and health inspections shall be conducted routinely in all work areas by supervision responsible for the activities and condition of the areas.</p> <p><b>NOTE:</b> <i>Such reviews need not be documented, and are designed to maintain a safe work environment during the course of normal daily activities, and as a readiness for the documented periodic inspections.</i></p>	I	10 CFR 851.22(a)
10.	<p>Mentoring of the supervisory staff in effective performance of safety and health inspections shall be conducted by cognizant project OS&amp;IH representatives, on an as-needed basis.</p> <p><b>NOTE:</b> <i>A project OS&amp;IH representative should periodically participate in a supervisory-led safety and health inspection.</i></p>	I	10 CFR 851.22(a)
11.	Any record documents shall be maintained in compliance with PRC-PRO-IRM-10588, <i>Records Management Processes</i> , or approved lower tier implementing document.	I	44 USC, Chapter 31; 851.26(a)(1)

### 3.2 Construction Work Site Safety and Health Inspections

#	Requirement	Type V or I	Source
1.	Daily work site safety and health inspections of construction projects shall be conducted and documented by the construction contractor, during periods of active work.	I	10 CFR 851 App A, Section 1(a)(1)
2.	<p>Periodic inspections of subcontracted work activity shall be conducted and documented to provide safety oversight and monitoring of compliance with applicable codes, standards and regulations.</p> <p><b>NOTE 1:</b> <i>Inspections should be conducted by a cognizant OS&amp;IH representative, in technical support of the Buyer's Technical Representative (BTR), where applicable.</i></p> <p><b>NOTE 2:</b> <i>The frequency of such inspections should depend upon the number and type of hazards involved, level of risk based on work scope, project duration, and prior experience with this subcontractor, presence of a qualified subcontractor safety and health representative, or need identified by the BTR.</i></p>	I	10 CFR 851 App A, Section 1(b)

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3.	Safety oversight inspections shall be tracked and trended to facilitate the earliest possible identification of issues, and assist the BTR in evaluating contractor performance.	I	10 CFR 851 App A, Section 1(b)

**3.3 Industrial Hygiene Baseline Hazard Assessment**

The requirement for conducting IH Baseline Hazard Assessments is contained in PRC-RD-SH-7769, *OSH Compliance*. The required methodology for conducting IHBHAs is provided in PRC-PRO-SH-17916, *Industrial Hygiene Baseline Hazard Assessment*.

**4.0 RECORD IDENTIFICATION**

All records are required to be managed in accordance with PRC-PRO-IRM-10588.

**Records Capture Table**

Name of Record	Submittal Responsibility	Retention Responsibility
Completed Inspection Checklists	Inspector	Inspector's Organization

**5.0 SOURCES****5.1 Requirements**

DOE O 414.1A, Contractor Requirements Document (CRD), *Quality Assurance*  
CRD O 226.1, *Implementation of Department of Energy Oversight Policy*  
CRD O 433.1A, *Maintenance Management Program for DOE Nuclear Facilities*  
10 CFR 851, U.S. Department of Energy, *Worker Safety and Health Program*  
44 USC 31, U.S. Code Collection, *Public Printing and Documents*  
48 CFR 970.5223-1, DOE Acquisition Regulation (DEAR), *Integration of Environment, Safety and Health into Work Planning and Execution*  
PRC-MP-QA-599, *Quality Assurance Program*

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### 5.2 References

29 CFR 1910, *Occupational Safety and Health Standards for General Industry*  
29 CFR 1926, *Occupational Safety and Health Standards for Construction*  
DOE/EH-0433, *Part I, Program Elements for Worksite Analysis requirements defined by the Department of Energy Voluntary Protection Program (DOE-VPP)*  
HNF-RD-9391, *Fire Protection Assessments*  
HNF-RD-9717, *Fire Prevention for Construction/Occupancy/Demolition Activities*  
PRC-GD-SH-28975, *Best Management Practices in Occupational Safety and Health*  
PRC-MP-MS-003, *Integrated Safety Management System/Environment Management System Description*  
PRC-MP-SH-32219, *10 CFR 851 CHPRC Workers Safety and Health Program Description*  
PRC-PRO-IRM-10588, *Records Management Processes*  
PRC-PRO-OP-055, *Startup Readiness*  
PRC-PRO-PMT-475, *Real Property Asset Management*  
PRC-PRO-QA-052, *Issues Management*  
PRC-PRO-QA-246, *Management Assessment*  
PRC-PRO-SH-17916, *Industrial Hygiene Baseline Hazard Assessment*  
PRC-RD-SH-7769, *OSH Compliance*

### 6.0 SAMPLE FORMS/CHECKLISTS

Sample forms/checklists are available through the OS&IH Central Support organization.

### 7.0 APPENDIXES

Appendix A - Basic Checklist Instructions (Guidance for Use)

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### Appendix A - Basic Checklist Instructions (Guidance for Use)

**NOTE 1:** *Each facility or project should develop their own specific hazard checklist.*

**NOTE 2:** *See Section 6.0 for links to examples of safety and health inspection checklist which are provided as non-mandatory examples.*

#### How should a checklist be used?

The checklist is used to document the results of a formal safety and health inspection.

- Review the checklist before the inspection begins.
- Determine the work areas to be inspected.
- Prepare an inspection sequence, to maximize organization and efficiency.
- Ask affected employees who are working in the area at the time of the walkthrough for input.
- Focus the inspection on unsafe acts/behaviors and unsafe conditions.
- Stop and observe employees working for a few minutes to enhance the observation process.
- Document any observed hazards clearly and accurately. Correct immediately, whenever possible (especially unsafe acts/behavior).

#### Who uses the checklist?

The checklist may be used by anyone involved in performing a formal safety and health inspection. Inspections should be conducted by a team consisting of representation from field work supervision and the employee workforce. A project safety representative should periodically accompany, but his/her primary responsibility is that of Mentor and Coach.

#### Who is responsible for the results of the check list?

The field work supervisor/department manager and the project manager are responsible for worksite conditions, and for correction of identified hazards.

#### Who retains the inspection records?

The project safety representative should retain a copy of the inspection record, and follow up to ensure the items are addressed in a timely manner. The project safety representative should keep management informed of results.

#### What to do with the check list observations?

Correct checklist observations in a timely manner, based on risk level. Correct serious hazards immediately; then set priority for correcting other hazards. Inspection results should be communicated to the workforce, using such media as meetings, newsletters, or postings.